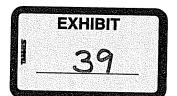
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IN THE UNITED STATES DISTRICT COURT FOR THE
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                   NORTHERN DISTRICT OF OKLAHOMA
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4
     W. A. DREW EDMONDSON, in his )
5
     capacity as ATTORNEY GENERAL )
     OF THE STATE OF OKLAHOMA and )
     OKLAHOMA SECRETARY OF THE
6
     ENVIRONMENT C. MILES TOLBERT,)
7
     in his capacity as the
     TRUSTEE FOR NATURAL RESOURCES)
8
     FOR THE STATE OF OKLAHOMA,
9
                  Plaintiff,
                                    ) 4:05-CV-00329-TCK-SAJ
10
     vs.
11
     TYSON FOODS, INC., et al,
12
                  Defendants.
13
                        THE DEPOSITION OF BOBBY
14
     WILLIAMS, produced as a witness on behalf of the
15
      Plaintiff in the above styled and numbered cause,
16
      taken on the 13th day of November, 2007, in the City
17
      of Tulsa, County of Tulsa, State of Oklahoma, before
18
     me, Lisa A. Steinmeyer, a Certified Shorthand
19
      Reporter, duly certified under and by virtue of the
20
      laws of the State of Oklahoma.
21
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23
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25
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TULSA FREELANCE REPORTERS 918-587-2878



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			. /
1	Q	Okay. Any other formal education after grade	
2	eleven?		
3	A	No.	
4	Q	Tell us what you presently do for your work or	
5	busine	ss.	11:06AM
6	A	I run a dairy farm and a beef farm, and we	
7	have m	milk route running; we haul milk.	
8	Q	Do you have a name for this business?	
9	A	W-5 Will Farms.	
10	Q	W5 Will Farm?	11:07AM
11	A	W-5 Will Farms, Inc.	
12	Q	Is that an Oklahoma corporation?	
13	A	Yes.	
14	Q	The land that W-5 Will Farm, Inc., is located	
15	on, is	s that the same land you gave me of your Route	11:07AM
16	1, Box	x 527 address?	
17	A	Yes.	
18	Q	Do you personally own that land, you and/or	
19	your v	wife, or does the W-5 Will Farm corporation own	
20	the la	and there?	11:07AM
21	A	My wife and I own it.	
22	Q	Okay. Have you ever been a contract poultry	
23	growe	r?	
24	A	Yes.	
25	Q	Tell me what dates starting and ending that	11:07AM

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1	you were a grower.		
2	A Well, I started I think in 1977 and I quit I'm		
3	pretty sure between 1986 and '88, and I don't		
4	remember for sure when.		
5	Q Okay. Who were the what was the name of	11:08AM	
6	the integrator that you grew birds for?		
7	A I grew for Hudson first, and then I switched		
8	to Cargill and grew for them, and then I grew		
9	Cargill sold out to Tyson I think. Anyway, I grew		
10	for Tyson until I quit.	11:08AM	
11	Q All right. When you operated as a poultry		
12	grower, what kind of birds did you grow?		
13	A Broilers, and then at the end before we quit		
14	we were growing the Cornish.		
15	Q Cornish hens?	11:08AM	
16	A Yes.		
17	Q So during the time that you worked for	¢	
18	Cargill, which kind of birds were you growing?		
19	A Broilers.		
20	Q And did you grow broilers or the Cornish for	11:08AM	
21	Hudson or both?		
22	A Broilers.		
23	Q So towards the end when you were growing		
24	Cornish, that would have been for Tyson?		
25	A Yes.	11:09AM	

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1	A	Right.			
2		MS. THOMPSON: Object to the form.			
3	Q	When you operated for the Cargill integrator,			
4	did yo	did you have a written contract?			
5	A	Yes, should have, best I remember.	11:14AM		
6	Q	Okay. Did you have written contracts with			
7	Hudson	Hudson?			
8	A	I suppose so. I can't remember all the			
9	detai:	ls. That's been too long ago, but you			
10	basica	ally have to have a contract to grow.	11:15AM		
11	Q	When you have one of those contracts, are you			
12	allow	allowed to negotiate any of the terms of those			
13	contr	contracts with the integrator?			
14	A	Not that I know of.			
15	Q	Did Cargill supply you a flock supervisor when	11:15AM		
16	you w	you were growing for Cargill?			
17	A	The field man, is that what			
18	Q	Yes, sir.			
19	A	Yes.			
20	Q	And how often would he come around?	11:15AM		
21	A	Usually once a week.			
22	Q	Is that the same for Hudson and for Tyson; did			
23	you h	you have the same kind of operation with them?			
24	A	Yes.			
25	Q	Did Cargill have any rules regarding how and	11:15AM		

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1	when	when you would clean out your poultry barns when you				
2	opera	operated it for them?				
3	A	Usually they required you clean out once a				
4	year.					
5	Q	Were those rules any different with Hudson or	11:15AM			
6	Tyson	Tyson?				
7	A	No.				
8	Q	Do you know whether Cargill knew generally				
9	what	you did with the poultry waste when you removed				
10	it fr	om the barns?	11:16AM			
11		MS. SOUTHERLAND: Object to the form.				
12	A	I don't really know because they never did				
13	ask.					
14	Q	All right. Did you ever tell the flock				
15	super	supervisor or the field man what you were doing with 11:16AM				
16	the p	the poultry waste?				
17	A	No.				
18	Q	Did they ever observe you cleaning out your				
19	barns	barns?				
20	A	No.	11:16AM			
21	Q	How many tons would you pull out of your barns				
22	each	each time you would do a clean-out?				
23	A	I don't rightly know. I never did weigh it.				
24	Q	Did you count the loads you would pull out?				
25	A	Well, when I cleaned out, back then I just had	11:16AM			

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